

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

United States Courts
Southern District of Texas
FILED

MAY 15 2014

UNITED STATES OF AMERICA

VS

1. Abel Hinojosa,
 2. Nelson Agapito Ventura,
 3. Daniel Reyna,
 4. Israel Sanchez,
 5. Rodolfo Hernandez Perez,
- Defendants

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David J. Bradley, Clerk of Court

CRIMINAL NO.

G 14 - 012

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Possess with Intent to Distribute Methamphetamine

From on or about April 1, 2013, and continuously thereafter, up to and including the date of this indictment, in the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court,

Abel Hinojosa,
Nelson Agapito Ventura,
Daniel Reyna,
Israel Sanchez,
and
Rodolfo Hernandez Perez,

defendants herein, did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A)(viii).

COUNT TWO

Possession with Intent to Distribute Methamphetamine

On or about May 9, 2013, in the Galveston Division of the Southern District of Texas,

Abel Hinojosa,

defendant herein, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved five (5) grams or more of methamphetamine and fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B)(viii).

COUNT THREE

Possession with Intent to Distribute Methamphetamine

On or about May 23, 2013, in the Galveston Division of the Southern District of Texas,

Abel Hinojosa,

defendant herein, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT FOUR

Possession with Intent to Distribute Methamphetamine

On or about May 29, 2013, in the Galveston Division of the Southern District of Texas,

Abel Hinojosa,
and
Rodolfo Hernandez Perez,

defendants herein, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii) and 18, United States Code, Section 2.

NOTICE OF CRIMINAL FORFEITURE (Title 21 U.S.C. § 853)

Pursuant to Title 21, United States Code, Section 853, upon conviction of the offenses set forth in Count 1, 2, 3, and 4 of this Indictment in violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(A)(viii), the defendants,

Abel Hinojosa (Counts 1, 2, 3, and 4),
Nelson Agapito Venturam (Count 1),
Daniel Reyna (Count 1),

Israel Sanchez (Count 1),
Rodolfo Hernandez Perez (Counts 1 and 4),

shall forfeit to the United States of America:

- (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation(s); and
- (2) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation(s).

Substitute Assets

In the event that the property which is subject to forfeiture to the United States, as a result of any act or omission of the defendants:

- (1) cannot be located upon exercise of due diligence;
- (2) has been placed beyond the jurisdiction of the Court;
- (3) has been transferred or sold to, or deposited with a third party;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of such property, pursuant to 21 U.S.C. §853(p).

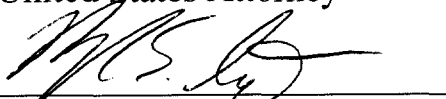
A TRUE BILL

Original signature on File

~~FOREPERSON~~ OF THE GRAND JURY

Kenneth Magidson
United States Attorney

By:



Ralph E. Imperato
Assistant United States Attorney